

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA
ERIE DIVISION**

WILLIAM H. STEINBRINK, M.D. and	:	
PATRICIA M. STEINBRINK, his wife,	:	
	:	
and	:	
	:	
BAYSIDE OBSTETRICS	:	
GYNECOLOGY INFERTILITY, INC.	:	
401(k) PROFIT SHARING PLAN,	:	
Plaintiffs	:	
	:	
vs.	:	CASE NO. CA 01-382 ERIE
	:	
ROTHSTEIN, KASS & COMPANY,	:	
P.C.; B. HAUPTMAN & ASSOCIATES,:	:	
LLC; BRUCE A. HAUPTMAN	:	
	:	
Defendants	:	JURY TRIAL DEMANDED

**MOTION FOR ENLARGEMENT OF TIME WITHIN WHICH TO RESPOND TO
PLAINTIFFS' MOTION FOR DISCOVERY**

NOW COMES the Defendant, Rothstein, Kass & Company, P.C., by its attorneys, Law Offices of Timothy D. McNair and respectfully moves this Honorable Court for enlargement of time within which to respond to Plaintiffs' Motion for Discovery, respectfully representing:

1. On January 22, 2007, in conjunction with their response to Defendant, Rothstein, Kass & Company's Motion to Dismiss, Plaintiffs filed a Motion for Discovery. Said Motion requests certain discovery of Rothstein, Kass & Company. On February 1, 2007, this Court entered an Order directing Defendant, Rothstein, Kass & Company to file a response to Plaintiffs' motion to take limited discovery by February 15, 2007.

2. Lead counsel for Defendant, Rothstein, Kass & Company, Joel Wolosky, Esquire, has

been engaged in legal proceedings in the state of California for the past two weeks, and has been unable to prepare a response to Plaintiffs' motion. Counsel have discussed the matter, and counsel for Plaintiff has no objection to a two week extension of time for Defendant, Rothstein, Kass & Company to file its response.

3. Given that Joel Wolosky, Esquire, has not had the opportunity to meet with the Defendant, since he has been out of state, it is submitted that the requested extension is reasonable.

4. As set forth above, Plaintiffs do not object to the extension.

WHEREFORE, Defendant, Rothstein, Kass & Company respectfully move this Honorable Court for an order extending the time within which to respond to Plaintiffs' Motion for Limited Discovery until March 1, 2007, an extension of two weeks.

Respectfully submitted,

LAW OFFICES OF TIMOTHY D. McNAIR

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